

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with)	CC Docket No. 94-102
Approaches to Wireless Enhanced 911)	
Emergency Calling Systems)	
)	
Verizon Wireless Puerto Rico, Inc.)	
Petition for Limited Waiver of Section)	FCC 00-436
20.18(c) of the Commission's Rules and)	
the Deadlines Established in the <u>Fourth</u>)	
<u>Report and Order</u>)	

**VERIZON WIRELESS PUERTO RICO, INC.'S QUARTERLY REPORT
REGARDING E911/TTY COMPATIBILITY AND REQUEST FOR WAIVER**

Pursuant to the Commission's Fourth Report and Order in CC Docket No. 94-102,¹ Verizon Wireless Puerto Rico, Inc. ("VWPRI"),² the CMRS affiliate of Puerto Rico Telephone Company, Inc. ("PRTC"), hereby submits its quarterly report regarding digital wireless compatibility with Text Telephone Devices ("TTY") in Puerto Rico. Additionally, for the reasons set forth herein and pursuant to Section 1.3 of the Commission's Rules,³ VWPRI hereby requests limited waiver of the January 15, 2002 deadline for carriers to file quarterly report concerning TTY-digital deployment, and the December 31, 2001 deadline for carriers operating

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Fourth Report and Order, 15 FCC Rcd 25216 (2000) ("Fourth Report and Order").

² Verizon Wireless of Puerto Rico, Inc. previously operated under the name of "Celulares Telefónica, Inc" ("CTI").

digital wireless systems to have obtained the software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices.

I. Quarterly Report

Currently, VWPRI is capable of transmitting TTY information using analog channels through its dual mode cellular system. VWPRI's Planning Department (the "Planning Department") is responsible for completing the TTY data transmission requirements. In August of 2001, the Planning Department was advised by the VWPRI's Data Services Group (the "Data Services Group") that the TTY data transmission equipment would be installed by Ericsson Caribbean ("Ericsson") as part of a larger trial of data transmission equipment being tested by VWPRI. Unbeknown to the Planning Department, the Data Services Group terminated the trial of the data transmission equipment in October 2001, and unfortunately, all of Ericsson test equipment was removed, including the TTY data transmission equipment.

The Planning Department became aware of the removal of the Ericsson equipment in January 2002. On learning of the removal of the equipment, VWPRI immediately commenced an internal review and contacted Ericsson to seek a proposal for the reinstallation of the necessary TTY data transmission equipment. After reviewing the proposal, VWPRI learned that Ericsson offers software that VWPRI can install in their current equipment that will permit VWPRI to transmit 911 calls from TTY devices over its digital system. Ericsson recently provided VWPRI with a new proposal for the TTY software, which VWPRI is currently evaluating. VWPRI and Ericsson are currently negotiating the terms of a license for the use of such software.

(..continued)

³ 47 C.F.R. § 1.3.

VWPRI plans to integrate, test, and deploy the technology purchased in conjunction with the public safety community in Puerto Rico. Based upon the estimated software delivery date that Ericsson Caribbean has provided informally, VWPRI estimates that it will be able to conduct testing with the Puerto Rico Public Safety Answering Point ("PSAP") during the third week of May 2002. VWPRI plans to achieve digital wireless compatibility with TTY throughout the island of Puerto Rico.

Additionally, VWPRI currently is unable to provide detailed information relating to the specifications of equipment and software developed to provide TTY-compatible service. Such information would have to be provided by VWPRI's equipment and software vendors because these vendors are directly involved in developing compliant equipment and software. Consequently, VWPRI urges the Commission to review the reports submitted by equipment and software vendors to obtain information concerning each vendor's development and testing activities.

II. Request for Waiver of Section 20.18(c) of the Commission's Rules and the Deadlines Established in the *Fourth Report and Order*

VWPRI seeks a limited waiver to submit its quarterly report concerning the status of its TTY-digital deployment after the January 15, 2002 deadline established by the Fourth Report and Order.⁴ VWPRI is submitting its quarterly report after the Commission-mandated deadline in light of recent events at VWPRI and its affiliate, PRTC. As stated earlier, the Data Services Group removed transmission equipment including TTY data transmission equipment that it was testing without advising the Planning Department. It was not until late January 2002, that the

⁴ While the quarterly reporting requirement is not codified in the Commission's rules, VWPRI requests this waiver out of an abundance of caution.

Planning Department learned of the removal. Consequently, VWPRI was unable to ascertain the status of its TTY implementation efforts in time to submit the quarterly report by the January 15, 2002 deadline.

In addition, VWPRI seeks a waiver of the December 31, 2001 deadline established by the Fourth Report and Order for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices.⁵ While VWPRI did install the equipment prior to the deadline, it was removed when the testing period ended, as stated earlier. VWPRI has taken steps to have the capability re-installed as soon as possible.

Pursuant to Section 1.3 of the Commission's Rules, the Commission has the discretion to waive the application of any of its rules on petition if good cause is shown.⁶ In the instant case, waivers of the Commission's deadlines are justified. The reduction in staff complicated VWPRI's internal review concerning its TTY-digital deployment efforts. The failure in communications between the Data Services Group and the Planning Department further limited VWPRI's ability to respond on a timely basis. Consequently, on January 15, 2002, VWPRI was unable to provide the Commission with a report regarding its TTY equipment and software deployment efforts.

With respect to the Commission's TTY equipment and software installation deadline, the Planning Department believed that its TTY equipment was installed as of the December 31, 2001 deadline. The decision by the Data Services Group to remove the data transmission equipment,

⁵ Although the December 31, 2001 deadline is not codified in the Commission's rules, VWPRI requests its waiver out of an abundance of caution.

⁶ 47 C.F.R. § 1.3.

which included the required TTY equipment that had been installed by Ericsson on a test basis,
was made without the knowledge of the Planning Department.

Respectfully submitted,

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